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*Attorneys for Defendants Apartment Management  
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*  
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a  
foreign limited-liability company; TMIF II  
PORTOLA, LLC, a foreign limited-liability  
company; APARTMENT MANAGEMENT  
CONSULTANTS, LLC, a foreign limited  
liability company; and RENE  
RICHARDSON, as AGENT of PORTOLA  
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline  
for Defendants Apartment Management  
Consultants, LLC and Rene Richardson to  
Respond to the Second Amended  
Complaint**

**(Fourth Request)**

1 Relator Peggy Thornton and Defendants Apartment Management Consultants, LLC and  
2 Rene Richardson (collectively “AMC”), by and through their respective undersigned counsel,  
3 hereby stipulate to extend AMC’s deadline to respond to Ms. Thornton’s Second Amended  
4 Complaint (“SAC”) by two weeks, to and including **December 10, 2024**, with the following  
5 background and reasons:

6 1. Ms. Thornton filed her SAC on September 24, 2024. ECF No. 108.

7 2. Under FRCP 15, AMC’s response to the SAC was therefore due on October 8,  
8 2024.

9 3. The Parties stipulated to grant AMC an additional three weeks to assess the SAC  
10 given the multiple rounds of motion-to-dismiss briefing filed thus far and in light of AMC’s  
11 counsels’ conflicting work travel. ECF No. 113. This extension also mirrored the one granted to  
12 co-defendant TMIF. ECF No. 110.

13 4. The Parties subsequently stipulated to grant AMC an additional two weeks to  
14 respond to the SAC due to unexpected scheduling conflicts, primarily including unexpectedly  
15 advanced deadlines in a federal pro bono trial. ECF No. 115.

16 5. During the intervening period, Ms. Thornton and AMC engaged in renewed  
17 settlement discussions.

18 6. Because the United States required additional time to review a settlement offer, as  
19 required under the False Claims Act, Ms. Thornton and AMC stipulated to extend AMC’s time to  
20 answer or otherwise respond to the SAC by two weeks, until November 26, 2024. ECF Nos.  
21 118-19.

22 7. The United States has subsequently requested an additional two weeks to review  
23 the settlement offer, in part due to the upcoming Thanksgiving holiday.

24 8. Because preventing AMC from expending additional attorney’s fees to respond to  
25 the SAC during that period would be conducive to settlement, the parties agree it is in their  
26 mutual best interest and judicial economy to likewise extend that response period by two weeks,  
27 to and until December 10, 2024.  
28

9. The Parties agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

**IT IS SO STIPULATED.**

Dated: November 25, 2024.

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

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*Attorneys for Defendant Apartment  
Management Consultants, LLC and Rene  
Richardson*

Dated: November 25, 2024.

NEVADA LEGAL SERVICES

By: /s/ Elizabeth S. Carmona

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*Attorneys for Relator*

**ORDER**

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. AMC's deadline to respond to the Second Amended Complaint is extended to and including December 10, 2024.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 11/26/2024

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline for Defendants Apartment Management Consultants, LLC and Rene Richardson to Respond to the Second Amended Complaint (Fourth Request)** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED November 25, 2024

/s/ Tiy Lewis  
An employee of SNELL & WILMER L.L.P.

4876-6853-6055